

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Mobility Fund Phase I Auction)	AU Docket No. 12-25
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109
)	
Universal Service Reform – Mobility Fund		WT Docket No. 10-208

**COMMENTS IN SUPPORT OF MOTIONS FOR EXTENSION OF TIME AND
SEPARATE COMMENT CYCLE**

The National Telecommunications Cooperative Association (“NTCA”) submits these comments in support of Motions for Extension of Time filed by the Rural Telecommunications Group (“RTG”)¹ and the Blooston Rural Carriers. NTCA joins requests that the Commission establish a separate comment cycle for challenging the American Roamer data that will be used as the basis for determining areas eligible for Phase I Mobility Fund support; and that the public be permitted to investigate and comment on the relevant information for at least 30 days from the

¹ Rural Telecommunications Group, Motion for Extension of Time (filed February 13, 2012); The Law Firm of Blooston, Mordkofsky, Duffy, Dickens, and Prendergast, LLP, on behalf of its rural clients (the “Blooston Rural Carriers”), Motion for Extensions of Time and Separate Comment Cycle (filed February 13, 2012),

current initial comment deadline of Friday, February 24, 2012. The Commission should also allow interested parties at least a 14-day reply comment period to contest any challenge claiming that 3G or better service is or is not available in their area of operation. Although the Commission does not routinely grant motions for extension of time, failure to do so in this instance would result in an incomplete record that would prevent the Commission from being able to engage in reasoned decision making.

The Wireline Competition Bureau and Wireless Telecommunications Bureau (the “Bureaus”) on February 2, 2012 released an *Auction 901 Public Notice* seeking comment on proposed procedures and eligible areas for the \$300 million Mobility Fund Phase I reverse auction. The Bureau established a 22-day comment period and provided a preliminary list of potentially eligible census blocks. This list was based on data provided by American Roamer in October of 2011. At that time, the Bureaus indicated that they would release a revised list of potentially eligible census blocks. The revised list was released on February 20, 2012, providing interested parties only 14 days to examine the census blocks identified in the revised list and submit comments.

NTCA joins RTG and the Blooston Rural Carriers in expressing concerns that the current comment deadlines of February 24th, and March 9th do not provide sufficient time for small and rural carriers to review the American Roamer data. Interested bidders must formulate their proposed bid area, review the American Roamer data, investigate possible discrepancies and assemble sufficient evidence to convince the FCC that the data should be revised. As the Blooston Rural Carriers point out, “these tasks cannot reasonably be accomplished by March 9, especially by carriers applying for multiple service areas.”²

² Motion of Blooston Rural Carriers, p.2.

NTCA's members have concerns about the accuracy and reliability of the American Roamer Data and stakeholders must have time to fully investigate the data. Auction 901 is intended to accelerate deployment of networks for mobile voice and broadband services in unserved areas. But haste to deployment should not undermine the purpose of Phase I support. Given the limited resources available, it is imperative that eligible areas receive support, and ineligible areas not receive support.

Accordingly and for the foregoing reasons, NTCA supports requests to extend the period for filing comments and reply comments on the American Roamer data.

Respectfully submitted,



By: /s/ Jill Canfield
Jill Canfield
Director, Legal & Industry

Its Attorney

4121 Wilson Blvd., 10th Floor
Arlington, VA, 22203
(703) 351-2020

February 16, 2012

CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing Comments of the National Telecommunications Cooperative Association in AU 12-25, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WT 10-208, DA 12-121, was served on this 16th day of February 2012 via electronic mail to the following persons:

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, D.C. 20554
Julius.Genachowski@fcc.gov

Commissioner Robert M. McDowell
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554
Robert.McDowell@fcc.gov

Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, D.C. 20554
Mignon.Clyburn@fcc.gov

Best Copy and Printing, Inc.
Federal Communications Commission
445 12th Street, SW, Room CY-B402
Washington, D.C. 20554
fcc@bcpiweb.com

Charles Tyler
Federal Communications Commission
Telecommunications Access Policy
Division, Wireline Competition Bureau
445 12th Street, S.W., Room 5-A452
Washington, D.C. 20554
Charles.Tyler@fcc.gov

/s/ Adrienne L. Rolls
Adrienne L. Rolls